

KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.

SUMNER SQUARE
1615 M STREET, N.W.
SUITE 400
WASHINGTON, D.C. 20036-3215

(202) 326-7900

FACSIMILE:
(202) 326-7999

April 4, 2022

Via ECF

The Honorable Paul A. Engelmayer
United States District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 2201
New York, New York 10007

Re: *Black v. Ganieva et al.*, No. 1:21-cv-08824-PAE (S.D.N.Y.)

Dear Judge Engelmayer:

We write on behalf of Plaintiff Leon D. Black to inform the Court that Plaintiff, pursuant to Federal Rule of Civil Procedure 15, intends to seek leave to file a Second Amended Complaint. We have requested a meet and confer with Defendants' counsel to determine whether they will consent to an amended pleading.

We have informed Defendants' counsel that we will agree to a reasonable extension of the current motion to dismiss briefing schedule, to permit Defendants to review the proposed amendment and determine whether to file replies to the Memorandum of Law in Support of Plaintiff's Opposition to Defendants' Motions to Dismiss, or to defer the reply briefing pending the Court's decision on a Rule 15 motion.

We will notify the Court of the parties' positions following a meet and confer on the foregoing issues.

Sincerely,

/s/ Susan Estrich

Susan Estrich
Counsel for Plaintiff

/s/ Reid M. Figel

Reid M. Figel

cc: Counsel of Record via ECF